

Dear FCC,

This is my second attempt at filing this document as the first response email from

you was incomplete.

I believe the current proposal to limit 160 meter phone operation as per the RM-10352 petition is ludicrous.

It's virtually nothing more than a minority of Self Servers attempting to change the law to

suit their own pleasure. Being as there is minimum of activity on 160 meters due to the

current Solar Maximum condition,

It's also my belief they are depending on very little opposition to their proposal.

The ARRL continually dreams up these "Band Plans" in accordance with whomever is

besieging them to have their own way and making the most noise. Mostly, That does not reflect what the vast majority

desire. The ARRL's "Band Plan" for 160 meters has changed

twice over the last 15 years. Both times the ARRL consumed and allotted more of the prime phone dx

portion of the 160 meter band it to CW only.

Nearly none of the many dx Phone operators that I have talked with over the last 20 years supported it

then, now do they now.

Yet, The ARRL continued to cater to those that complain and adopt whatever police they so see fit.

Now, According to the ARRL, All dx phone operators and I have been pushed up

to a maximum 7KC for phone dx operations. Realistically, That's marginally enough room for

more than 2 communications occurring at one time.

It's been my experience that

many CW operators regard the ARRL's band plan as law for the phone operators but not for themselves.

When I first became involved with 160 meters in 1982, 1.835 and up was considered to be a phone operation part

of the band. Then the ARRL "Decided" a new "Band Plan" of 1.840 and lower would be for CW only.

More recently the ARRL "Decided" that 1.843 and lower would be CW only.

For all practical purposes, We dx phone operators have now lost over 50% of the prime phone DX portion of the band.

It's been my experience over the last 20 years that many CW operators will intentionally cause interference by moving close to the frequency we are operating on and "Pretend" they didn't know we were there. Others will go to phone and verbally complain.

The vast majority of dx phone operators have been forced into

abiding by the ARRL's whim because of intentional interference by those that support it.

Now it appears a comparatively few Self Servers that have plenty of Time, Money or both want to make it the latest ARRL's

"Band Plan" law. If it in fact it becomes law, All Phone operators will essentially be push up to 1.845 and above for all practical purposes.

The Self Servers will then constantly complain about splatter when any phone operator attempts to operate on 1.843.

That was their original complaint when they cried to the ARRL about changing the "Band Plan" from 1.835 to 1.840

for CW only in the 1980's.

I would not support any frequency allotment rule making changes to 160 meters for any reason.
Most additional restrictive type rules do little more than create animosity amongst most everyone affected and generate an atmosphere of ill content.
I would however not be opposed to a CW portion only if I was not being virtually pushed out of the phone dx portion of the band.
If those that are seeking to serve only themselves continue getting their own way, and especially with RM-10352 becoming law, They would have driven one more nail in the coffin of the True Spirit of Amateur Radio.
That same True Spirit that seems to have eluded them now, as in the past.
Thanks for your time
Ralph